



U.S. Department of Justice

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August 31, 2018

Honorable Catherine C. Blake
United States District Court for the District of Maryland
101 West Lombard Street Baltimore,
MD 21201

Re: United States of America v. Montana Barronette et al
Criminal No. CCB-16-597

Dear Judge Blake:

On August 28, 2018, the Court held a pretrial conference in the above captioned case. At the conclusion of the conference, the Court directed the government to provide a status update on various issues raised during the conference.

Ballistics reports. Contained in the homicide files are summary reports of firearm and toolmark examinations, which were previously produced. On August 7, 2018, Montana Barronette, through counsel, requested reports, photographs, notes, manuals and other materials related to those reports. The government subsequently obtained those reports from the Baltimore City Police Department (“BPD”) and made them available for counsel on August 16, 2018. To date, all counsel have received the disclosure.

Transcripts. On August 30, 2018, the government disclosed copies of draft transcripts for all, or nearly all, of the intercepted communications the government intends to introduce at trial. The government will notify counsel of any changes to those transcripts and supplement the disclosure as necessary. The government is finalizing transcripts for the jail calls it intends to introduce at trial and will make the transcripts available by September 4, 2018. The number of jail calls will be less than ten.

Giglio. In addition to conducting a Giglio review with each law enforcement witness, the government is also coordinating directly with BPD to identify any substantiated allegation or complaint against the witnesses. If the government identifies any such material, it will make it the material or a summary of the material available to the Court for an in-camera inspection.

Jencks. On today's date, the government has disclosed, via email, a significant portion of the relevant grand jury material. The government will provide additional Jencks material on September 4, 2018. The government is withholding some grand jury material for safety reasons.

Very truly yours,

Robert K. Hur
United States Attorney
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By: _____/s/_____
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